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May 22, 2020

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Roy Day v. MTA New York City Trans. Auth., et al.*, 17 Civ. 7270 (VSB)

Dear Judge Broderick,

We represent the Defendants in this matter and write jointly with *pro se* Plaintiff and limited *pro bono* counsel for Plaintiff to respectfully request a sixty (60) day extension of the remaining discovery deadlines and a corresponding adjournment of the post-discovery status conference which is currently scheduled for July 24, 2020 in order to complete outstanding depositions in this matter. This is the third request for an extension and is occasioned by the COVID-19 pandemic interfering with the parties' ability to conduct and complete depositions as previously contemplated. The parties have otherwise been able to conduct written discovery and document productions, which are nearly complete. This request will not affect any other deadlines in this matter.

In light of the continued uncertainties caused by the global health crisis, the parties have taken steps in furtherance of completing depositions by remote means and securing the necessary technology to do so. The parties have also exchanged proposed deposition dates, all of which can be completed by this jointly-proposed amendment to the Case Management and Scheduling Order:


- Depositions to be completed by August 3, 2020;
- All fact discovery to be completed by August 31, 2020;
- Post-discovery conference to be held on or after September 22, 2020.

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HOGUET NEWMAN
REGAL & KENNEY, LLP

We thank the Court for its time and attention to this matter.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'H. Hechtkopf', with a stylized flourish at the end.

Helene R. Hechtkopf